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**Via Email and U.S. Mail**

Heidi K. Hoffman  
U.S. Department of Justice  
Environment & Natural Resources Div.  
Denver Place Bldg. – South Terrace  
999 18th Street, Suite 370  
Denver, CO 80202  
Heidi.Hoffman@usdoj.gov

**Via Email and U.S. Mail**

Andrea Madigan  
EPA Region 8  
1595 Wynkoop St.  
Denver, CO 80202-1129  
madigan.andrea@epamail.epa.gov

Re: *Response to Requests for Information Pursuant to CERCLA Section 104(e); Gilt Edge Mine Site, Lawrence County, South Dakota*

Dear Ms. Hoffman and Ms. Madigan:

In the course of the continuing good faith search by CoCa Mines, Inc., Hecla Limited, and Hecla Mining Company (collectively, the “Companies”) for documents that may be responsive to previous CERCLA 104(e) and other requests for information sent to the Companies for the Gilt Edge Mine Site in Lawrence County, South Dakota (collectively, “Gilt Edge Information Requests”), the Companies recently became aware of certain additional potentially responsive information that was saved and stored in electronic format.

In approximately 1991, the Companies began backing up to analog tapes (“Backup Tape” or “Backup Tapes”) certain data on their computers and servers at the end of each month. This procedure continued to some extent into 2011. While the Companies have attempted to determine whether any responsive information exists on these tapes, searching them has proven extremely difficult, time consuming, and expensive.

The Companies recently concluded an initial inventory of all 1,020 Backup Tapes. The Companies believe that approximately 630 Backup Tapes may contain data that is *potentially* responsive to the Gilt Edge 104(e) Requests.

The Companies only have functional hardware to read 170 of the Backup Tapes, generally those created after 2009. To determine the contents of the 170 readable Backup Tapes in-house, the Companies would have to restore, catalogue, and transfer the data from each of the 170 Backup Tapes to external media one at a time, at an estimated rate of one full day per Backup Tape, or 34 weeks in total. The alternative would be to engage a third-party vendor. The remaining, older Backup Tapes also would need to be sent to a third-party data recovery company.

Very few data recovery services appear to have both the ability to read the Companies' older tapes and the near-term capacity for such a large project. Simply restoring data from the 630 Backup Tapes to currently-readable media will take approximately six to eight weeks, at a cost of up to \$900.00 each, depending on the age and capacity of the tape.

However, it also is likely that a substantial portion of the 630 Backup Tapes, especially those from 1991 through 1995, have been damaged or degraded due to age, which will increase the time and cost of recovering the data. The estimated cost to recover data from damaged Backup Tapes and transfer the data to currently-readable media could be up to \$2,900.00 per tape. Assuming, conservatively, that 20 percent of the 630 Backup Tapes will require some measure of recovery services, the total estimated cost to transfer the data from the Backup Tapes to currently-readable media could be up to \$835,000.00. In addition, there is concern that the process of attempting to recover data from the Backup Tapes may irreversibly damage them.

This estimate only covers the cost and time to restore data from the Backup Tapes to currently-readable media. Because there is no way to determine the contents of the Backup Tapes or their responsiveness to the previous information requests, all of the approximately 200 terabytes of data would need to be catalogued and searched, adding an additional, significant amount of cost and time to the exercise.

In short, any information on Companies' Backup Tapes, a substantial portion of which likely contain erased, fragmented, and damaged data, is not reasonably accessible. Accordingly, the Companies currently have no plans to restore, recover, and search the Backup Tapes for information responsive to the Gilt Edge Information Requests.

Please feel free to contact me if you have any questions.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Elizabeth H. Temkin', with a long horizontal flourish extending to the right.

Elizabeth H. Temkin